

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

INNOVATION VENTURES, LLC,

Plaintiff,

v.

BHELLIOM ENTERPRISES CORP.,

Defendant.

Case No. 2:09-cv-13783

Hon. Mark A. Goldsmith

**MOTION FOR LEAVE TO FILE UNDER SEAL AND
BRIEF IN SUPPORT**

Plaintiff Innovation Ventures, LLC (“Living Essentials”) respectfully submits this Motion for Leave and Brief in Support of Leave to File its Motion for Partial Summary Judgment That Bhelliom’s Advertising is False under seal, pursuant to Local Rule 5.3, and prays that the Court grant this motion. There is good cause for filing the brief under seal as it contains and references confidential and proprietary business information. Accordingly, Living Essentials requests that it be permitted to file under seal. (A redacted version has been filed in the public record.)

A proposed Order is being submitted to the Court.

Respectfully submitted,

BROOKS KUSHMAN P.C.

By: /s/ Thomas W. Cunningham

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Dated: November 16, 2015

CERTIFICATE OF ELECTRONIC SERVICE

I hereby certify that on November 16, 2015, I electronically filed the foregoing document with the Clerk of the Court for the Eastern District of Michigan using the ECF System which will send notification to the registered participants of the ECF System as listed on the Court's Notice of Electronic Filing.

BROOKS KUSHMAN P.C.

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